

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PAULA F. SOTO,

Plaintiff,

Civil Action No. 1:13-cv-10822-JGD

v.

CITY OF CAMBRIDGE,

Defendant.

**DECLARATION OF KEVIN S. PRUSSIA IN SUPPORT OF
JOINT SUPPLEMENTAL STATEMENT OF FACTS**

I, KEVIN S. PRUSSIA, pursuant to 28 U.S.C. § 1746, hereby declare the following under penalty of perjury:

1. I am a partner at the law firm of Wilmer, Cutler, Pickering, Hale and Dorr LLP, and am counsel of record for Plaintiff Paula F. Soto in this action. I am a member in good standing of the bar of Massachusetts and I am admitted to practice in the United States District Court for the District Massachusetts. I submit this declaration in support of the parties Joint Supplemental Statement of Facts. I have personal knowledge of the statements contained in this declaration and, if called as a witness, would testify competently to the statements contained in this declaration.

2. Attached hereto as Exhibit 1 is a true and accurate copy of Defendant City of Cambridge's Responses to Plaintiff Paula F. Soto's First Set of Requests for Admissions, dated August 1, 2014.

3. Attached hereto as Exhibit 2 is a true and correct copy Plaintiff Paula F. Soto's Second Set of Requests for Admission to Defendant City of Cambridge, dated October 6, 2015.

4. Attached hereto as Exhibit 3 is a true and accurate copy of Plaintiff Paula F. Soot's Second Set of Interrogatories to Defendant City of Cambridge, dated October 6, 2015.

5. Attached hereto as Exhibit 4 is a true and correct copy of an Email from Mr. Aylesworth to Ms. Ong, dated October 7, 2015.

I, Kevin S. Prussia, declare under the pains and penalties of perjury that the foregoing is true and correct. Executed in Boston, Massachusetts on October 26, 2015.

/s/ Kevin S. Prussia
Kevin S. Prussia

CERTIFICATE OF SERVICE

I, Julia M. Ong, hereby certify that a true and correct copy of the above document was filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 26th day of October 2015.

/s/ Julia M. Ong
Julia M. Ong